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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

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This Document Relates to:

25

H.D. filed on behalf of minor J.D. v. Meta Platforms, Inc., et al., 4:23-cv-01425;

26

Jeffrey Barnes, filed on behalf of minor A.B. v. Meta Platforms, Inc., et al., 4:23-

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS IN SUPPORT OF PLAINTIFFS'
SECOND CONSOLIDATED EX PARTE
APPLICATION FOR APPOINTMENT OF
GUARDIANS AD LITEM**

1 cv-01422;

2 *Richard Neal Booker, individually and on*
 3 *behalf of their minor child S.B. v. Meta*
Platforms, Inc., et al., 4:23-cv-01537;

4 *C. G. filed on behalf of minor A.G. v. Meta*
 5 *Platforms, Inc., et al., 4:23-cv-01568;*

6 *N.K. filed on behalf of minor S.K. v. Meta*
 7 *Platforms, Inc., et al., 4:23-cv-01584;*

8 *M.M., filed on behalf of minor B.M. v. Meta*
 9 *Platforms, Inc., et al., 4:23-cv-01615;*

10 *C.S., filed on behalf of minor J.S. v. Meta*
 11 *Platforms, Inc., et al., 4:23-cv-01569;*

12 *S.S. filed on behalf of minor M.S. v. Meta*
 13 *Platforms, Inc., et al., 4:23-cv-02024; and*

14 *K.C. filed on behalf of minor M.C. v. Meta*
 15 *Platforms, Inc., et al., 4:23-cv-01465*

16 Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for
 17 administrative relief to file under seal the individual *Ex Parte* Applications for Appointment of
 18 Guardian *Ad Litem* (“Applications”) described in Plaintiffs’ Second Consolidated *Ex Parte*
 19 Application for Appointment of Guardians *Ad Litem* (“Consolidated *Ex Parte* Application”) and
 20 attached as Exhibits 1 to 9 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’
 21 Second Consolidated *Ex Parte* Application (“Anderson Declaration”).

22 The Applications for which sealing is sought are:

- 23 • *H.D. filed on behalf of minor J.D. v. Meta Platforms, Inc., et al., 4:23-cv-01425*
 (Exhibit 1);
- 24 • *Jeffrey Barnes, filed on behalf of minor A.B. v. Meta Platforms, Inc., et al., 4:23-cv-*
 01422 (Exhibit 2);
- 25 • *Richard Neal Booker, individually and on behalf of their minor child S.B. v. Meta*
 Platforms, Inc., et al., 4:23-cv-01537 (Exhibit 3);
- 26 • *C. G. filed on behalf of minor A.G. v. Meta Platforms, Inc., et al., 4:23-cv-01568*

(Exhibit 4);

- *N.K. filed on behalf of minor S.K. v. Meta Platforms, Inc., et al.*, 4:23-cv-01584 (Exhibit 5);
 - *M.M. filed on behalf of minor B.M. v. Meta Platforms, Inc., et al.*, 4:23-cv-01615 (Exhibit 6);
 - *C.S., filed on behalf of minor J.S. v. Meta Platforms, Inc., et al.*, 4:23-cv-01569 (Exhibit 7);
 - *S.S. filed on behalf of minor M.S. v. Meta Platforms, Inc., et al.*, 4:23-cv-02024 (Exhibit 8); and
 - *K.C. filed on behalf of minor M.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-01465 (Exhibit 9).

This motion is accompanied by a proposed order and the Declaration of Jennie Lee Anderson In Support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Second Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson Decl. ISO Admin Motion") pursuant to Civil Local Rules 7-11 and 7-12. *See* Civ. L. R. 79-5(c).

This Court previously considered and finding good cause granted Plaintiffs' request to seal applications for guardians *ad litem* in this case. ECF No. 16.

Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants on April 26, 2023, to stipulate that these Exhibits may be filed under seal. Liaison Counsel for Defendants confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶ 5.

For the reasons set forth above, Plaintiffs respectfully request that the Court enter the [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Exhibits In Support of Plaintiffs' Second Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem.*

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2 Dated: April 26, 2023

Respectfully submitted,

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